

IN THE UNITED STATES DISTRICT COURT
FOR THE MIDDLE DISTRICT OF TENNESSEE

FILED

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U.S. DISTRICT COURT
MIDDLE DISTRICT OF TN

Robert L. Ogletree, JR

Name of Plaintiff(s)

v.

Case No. _____
(To be assigned by Clerk)

James Vanderveer

Rutherford County

Sheriff Office

Name of Defendant(s)

COMPLAINT

1. State the grounds for filing this case in Federal Court (include federal statutes and/or U. S. Constitutional provisions, if you know them):

1982 lawsuit packet

2. Plaintiff, Robert L. Ogletree resides at

610 NW Broad St. Murfreesboro
Street address City

Rutherford TN 37129 615-809-6577
County State Zip Code Telephone Number

(If more than one plaintiff, provide the same information for each plaintiff below.)

N/A

3. Defendant, Deputy James Vander Veer resides at
940 New Salem Road Murfreesboro
 Street address City
Rutherford TN 37129 615-809-6577
 County State Zip Code Telephone Number

(If more than one defendant, provide the same information for each defendant below.)

N/A

4. Statement of claim. (State as briefly as possible, the facts of your case. Describe how each Defendant is involved. Include also the names of other persons involved, dates, and places. Be as specific as possible. You may use additional paper if necessary. Attach any documentation or exhibits in support of the complaint):

10-27-2013 Deputy James Vander Veer. Pepper
sprayed Robert L. Ogletree, JR, as he sat with
his legs crossed. Deputy James Vander Veer was
standing on the other side of a door with
the flap down. Plaintiff will show that Rob-
ert L. Ogletree, JR was not resisting, Estate of
Booker V. Gomez #12-1496, 745 F3d 405
(10th cir. 2014) Plaintiff will show and prove
that Deputy James Vander Veer, act of assault
was repugnant to the conscience of Man-
Kind. Hogan V. Fischer, #12-4246, 2013

5. Prayers for Relief (List what you want to Court to do):

a. 225,000 ircompensatory damages
226,000 ir punitive damages
Degorski v. Wilson #104-ev

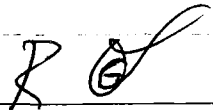
b. _____

c. _____

d. _____

I (We) hereby certify under penalty of perjury that the above Petition is true to the best of my (our) information, knowledge, and belief.

Signed this _____ day of _____, 20____.

 _____

(Signature of Plaintiff(s))

U.S. lexis 25 337 (2nd cir) Plaintiff will also show that James Vanderveer violated a clearly established law. Roberson v. Torres; 13-1405, 77 F. 392 (6th cir. 2014) Plaintiff will also show that Deputy James Vanderveer deprived Robert L. Ogletree, JR. The right to be free from cruel and unusual punishment. Violating Robert L. Ogletree, JR constitutional rights. Plaintiff will show that his vision has been effected from being sprayed by Deputy James Vanderveer with pepper spray. Plaintiff will show that Deputy James Vanderveer knew that the use of force posed a risk of harm to the Plaintiff, but that he recklessly disregarded his safety Kingsley v. Herdrickson #12-3639, 2014 U.S. App lexis 3972 (7th cir) Plaintiff will show that Deputy James Vanderveer is not entitled to qualified immunity. Edwards v. Byrd #13-1560 (2014 U.S App. lexis 7670 8th cir) Plaintiff will show that Deputy James Vanderveer violated the protections of the Constitution. Turner v. Safley 482-U.S-7889

Respectfully; submitted,

Robert L. Ogletree, JR

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